

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE:

LITHIUM ION BATTERIES ANTITRUST
LITIGATION

Case No. [13-md-02420-YGR](#) (DMR)

**ORDER RE PLAINTIFFS' MOTION TO
COMPEL DEPOSITION OF JAE
JEONG JOE**

Re: Dkt. No. 1122

Plaintiffs and Defendants LG Chem Ltd. and LG Chem America, Inc. ("LG Chem") filed a joint discovery letter brief regarding Plaintiffs' motion to compel LG Chem to produce Jae Jeong Joe for deposition. [Docket No. 1122.]

Having reviewed the joint letter, the court finds that it would benefit from further evidence and briefing by the parties. By no later than March 16, 2016, LG Chem shall submit a detailed declaration(s) describing exactly what steps LG Chem took to make Joe available for deposition after the decision was made to not renew his contract, including identifying exact dates, steps taken, and the individuals involved. LG Chem's declaration(s) shall set also forth the substance of LG Chem and/or its counsel's communications with Joe without resulting in any waiver of the attorney-client privilege. LG Chem may redact any attorney-client privileged communications from the publicly-filed declaration(s), and lodge the unredacted version(s) of its declaration(s) for in camera review. By March 16, 2016, LG Chem shall also file evidence regarding Joe's employment with LG Chem, including: a) documents that show Joe's employment history with LG Chem, including dates, job titles, and compensation; b) documents which show any pay and benefits Joe continued to receive after November 26, 2015, e.g., any severance or separation agreement; and c) documents related to LG Chem's decision not to renew Joe's contract for 2016 sufficient to show the timeline of that decision.

By March 21, 2016, LG Chem and Plaintiffs may submit a two-page letter brief addressing

the evidence submitted by LG Chem in connection with this dispute.

IT IS SO ORDERED.

Dated: March 11, 2015



United States District Court
Northern District of California